

To promote the economic, social and environmental viability of Northern California by enhancing and preserving the water rights, supplies and water quality of our members.

August 19, 2005

California Department of Water Resources Division of Planning and Local Assistance Attn: Tracie Billington P.O. Box 942836 Sacramento, CA 94236-0001

**RE:** Comments on the Draft Proposal Solicitation Package for Implementation Grants, Step 2

Dear Tracie,

The Northern California Water Association (NCWA) appreciates this opportunity to provide comments and questions regarding the "Draft Proposal Solicitation Package for Implementation Grants, Stage 2." NCWA represents 70 agricultural water districts and agencies, private water companies, and individual water rights holders with senior rights and entitlements to the surface waters of the Sacramento Valley. NCWA's members also have overlying and appropriative water rights to groundwater resources in Northern California, from the Northern reaches of Shasta County to Sacramento County, from the edge of the Sierra Nevada Mountains in El Dorado County to Glenn County which extends to the Coast range. In addition, NCWA represents the counties in the region.

Regarding the timing of the Proposal Solicitation Package (PSP), it would be a great help to receive the final version of the PSP as soon as possible. The Sacramento Valley IRWMP consists of 20 projects, each requiring considerable documentation for the Stage 2 application. As soon as the final PSP is available we will begin work on the Stage 2 application. We would prefer not to wait until the announcements are made of who is invited to participate in Stage 2. If the whole PSP cannot be released, would it be possible to finalize and circulate the criteria for Attachment 7 in advance, as this section will require the development of considerable new information?

Upon review of the Step 2 application, we cannot help but notice that this document is requiring applicants to once again submit a considerable amount of information. It would be beneficial to applicants if the Department of Water Resources and the State Water Resources Control Board would indicate on either the Step 2 application, or preferably in the review of the Step 1 application, the sections where the information submitted for Step 1 is adequate to meet the requirements for Step 2 and those areas where additional information or detail is required. An

example of this is the "Work Plan" section in Step 2 and the "Description of Proposal" in Step 1. I suspect that some of the applications submitted in Stage 1 contain a level of detail in "Attachment 6 – Description of Proposal" to meet much of the criteria for "Attachment 3 – Work Plan" in the Step 2 application. In addition, there is obvious carryover of information in the "Schedule," "Program Preferences," and "Statewide Priorities" sections. If the reviewers could indicate those sections of the applications that were covered with the information provided in Step 1, it would significantly simplify the application development process. If the reviewers are looking for something different between Step 1 and Step 2, then it would be helpful to specify the difference between the two application requirements.

Over all, it would be beneficial to the applicants if the reviewers can indicate any areas where we can avoid duplicating efforts from the first application, and the specific differences in detail and requirements between the two applications. If at all possible, this should occur with the individual application reviews.

Please give me a call if you would like for me to elaborate on these comments (916) 442-8333.

Sincerely,

Todd N. Manley

**Director of Government Relations** 

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